

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*  
Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)  
*hvu@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
601 S. Figueroa Street, 41st Floor  
Los Angeles, California 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC;  
Otto Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
OPPOSITION AND NOTICE TO JOIN AND  
ADOPT DEFENDANTS UBER  
TECHNOLOGIES, INC.'S AND  
OTTOMOTTO LLC'S OPPOSITION TO  
PLAINTIFF WAYMO LLC'S MOTION FOR  
CONTINUANCE OF TRIAL DATE**

Courtroom: 8 (19th Floor)  
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:  
1. Declaration of Neel Chatterjee  
2. [Proposed] Order  
3. Unredacted/Redacted Version  
4. Proof of Service

Trial: October 10, 2017

Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto Trucking”) submits this Administrative Motion to File Under Seal Portions of Its Opposition and Notice to Join and Adopt Defendants Uber Technologies, Inc.’s and Ottomotto LLC’s Opposition to Plaintiff Waymo LLC’s Motion for Continuance of Trial Date (the “Opposition and Joinder”). Specifically, Otto Trucking requests an order granting leave to file under seal the confidential portions of the following document:

Document	Portions to Be Filed Under Seal	Designating Parties
Opposition and Joinder	Yellow highlighted portions	Anthony Levandowski

The above referenced portions of the Opposition and Joinder contain information designated by Anthony Levandowski as “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in this document.

Otto Trucking anticipates that Mr. Levandowski will file a declaration in accordance with Local Rule 79-5.

Otto Trucking’s request to seal is narrowly tailored to those portions of the Opposition and Joinder that merit provisional sealing.

Dated: September 16, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee

Neel Chatterjee

*nchatterjee@goodwinlaw.com*

Brett Schuman

*bschuman@goodwinlaw.com*

Shane Brun

*sbrun@goodwinlaw.com*

Rachel M. Walsh

*rwalsh@goodwinlaw.com*

Hong-An Vu

*hvu@goodwinlaw.com*

**GOODWIN PROCTER LLP**

*Attorneys for Defendant: Otto Trucking LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 18, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on **September 18, 2017**.

/s/ Neel Chatterjee  
NEEL CHATTERJEE